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Plano, TX 75074

August 21, 2009

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Suite TW-A325
Washington, D.C. 20554

Re: WC Docket No. 09-144, In the Matter of 'Securus Technologies, Inc. Petition for Declaratory Ruling'

Dear Ms. Dortch:

Value-Added Communications, Inc. (VACI) hereby submits this letter in support of the Securus Petition for Declaratory Ruling in WC Docket No. 09-144.

VACI is an Inmate Telecommunications operating company that holds certifications as a telecommunications carrier throughout the United States, and serves over 400 correctional facilities in 44 states. These correctional facilities range from small city and county jails to state correctional systems to the Federal Bureau of Prisons. VACI leads the Inmate Telecommunications Industry in the development and licensing of innovative technology necessary for providing inmate telecommunications services.

VACI experiences the same 'call diversion' as defined in the Securus Petition; and as documented in the Securus Petition by Securus and Global Tel*Link. In addition; because of the VACI involvement in the Federal Bureau of Prison sites, the issue of national security can also be involved with these 'call diversion' schemes.

The Securus Petition should be granted so that correctional authorities can regain control over all calls that inmates place. Schemes that try to mask call destinations must be stopped. Please allow the correctional authorities, VACI and the other inmate telecommunications providers to

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prevent these fraudulent schemes and to continue to provide the safe and secure service that is needed for our nation and its citizens.

Kermit D. Heaton

A handwritten signature in black ink, reading "Kermit D. Heaton". The signature is fluid and cursive, with the first name "Kermit" being more prominent and the last name "Heaton" following in a similar style. There is a long horizontal stroke extending from the end of the signature.

Value-Added Communications
EVP, Corporate Administration

CC:

2 copies

Lynne Hewitt Engledow

FCC, Wireline Competition Bureau

Pricing Policy Division

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